

November 1997
Program Letter

Tank Tightness Testing Questions Answered

During a recent series of talks around the state, we received a series of questions regarding the use of tightness testing systems. Although many owners and operators have completed a move over to monthly monitoring, there are still a segment of tanks that are using tightness testing as the method of leak detection. As a result, we felt it might be timely to repeat the questions and the answers we provided.

The questions that we received were as follows:

Question 1. If I started using a specific type of tightness test, do I have to continue using that exact test methodology or can I change to a different system?

Answer: An owner or operator can change tightness testing systems as long as the system chosen is approved under the Department's Materials Approval program, the operator is certified to perform the test, and the system is used in conformance with its approval. The requirement that a system obtain approval through the Material Approval process helps guarantee that any system in use meets the performance standards included in EPA and state rules.

Question 2. If a tank system fails a tightness test and then passes when it is re-tested with a different system, can the tank be placed back in operation?

Answer: The fact that one test resulted in a failure and another resulted in a pass does not resolve the concerns regarding the integrity of the tank. It simply means that more analysis and work must be done to explain what is taking place. This additional effort may require more testing, isolation of variables or further analysis of results. The key dimension is that the results must be explained and the tank conclusively proven as tight.

Question 3. Will an inspector require a specific test methodology be used?

Answer: In most cases, the choice of tightness test system will be left up to the owner or operator. There have been instances, however, where the Department has required a specific type of test be used or that a specific test be rerun. In the instances when this has taken place, it has usually been in response to conflicting test results or in a belief that a specific test would provide unique information on the status of a tank.

Question 4. Can a company perform their own tightness testing?

Answer: The code does not provide a general prohibition against an owner or operator using a qualified member of their staff to perform tightness testing for their tanks. The individual performing the test must be certified to perform the test and it must be a methodology that has obtained approval through the Materials Approval program. All testing and record keeping must be performed in compliance with the administrative code.

The Department does reserve the right, however, to require an independent test if there is a belief that test methodologies are not being complied with or there is some reason to doubt the validity of results. In an instance of this nature, the Department would order the owner or operator to secure an independent professional to perform testing.

Question 5. If a leak is found in the top of a tank, can it be kept in operation if the owner agrees not to fill the tank all the way to the top?

Answer: No. To remain in operation, the tank must be tight.